

# EXHIBIT B

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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

- - - - - x  
RITLABS, S.R.L., :  
Plaintiff, :  
vs. :Case No.1:12-cv-00215  
RITLABS, INC., ET AL., :  
Defendants. :

- - - - - x  
June 4, 2012  
Alexandria, VA

DEPOSITION OF:

STEFAN TANURKOV

called for examination by counsel for the Defendants,  
pursuant to notice, taken at the offices of I.S. Law  
Firm, PLLC, 1199 North Fairfax Street, Suite 702,  
Alexandria, Virginia, commencing at 8:58 a.m., before  
Misty Klapper, a Notary Public in and for the  
Commonwealth of Virginia, when were present on behalf  
of the respective parties:

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1 mean you were a shareholder or an employee?

2 A. Employee.

3 Q. So the employees were the people you just  
4 identified?

5 A. Employee, but as for share -- for  
6 shareholders, as I remember the story, I don't -- I  
7 don't think it was February 16 actually. I think it  
8 was early in 1997 when the government required to --  
9 companies to re-apply the -- just to re-register for  
10 some reason I don't know.

11 But at that time a lot of such things  
12 happened that change some documentary and laws and all  
13 this stuff. And we were requested to make a lot of  
14 things that I now can recall stupid maybe or  
15 unexplainable. At least -- well, I still don't -- I  
16 can't explain what was the reason for re-registering  
17 existing commercial companies, maybe because there  
18 were a lot of dead companies at that time, which --  
19 because it was just start of capitalism in Moldova.

20 So the -- anyway, the government  
21 requested to re-register the company, RIT, SRL, as  
22 well as all others. And at that moment it was found

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1 that the founders of RIT, SRL, namely ALEX, SRL and  
2 IBIS, SRL. So we don't exist.

3 Now, this is for some reason I don't know  
4 exactly what it was, and they cannot re-register RIT,  
5 SRL. This is why we decided to register our own  
6 company, we -- no, I mean, three -- me, Demcenko,  
7 Masiutin.

8 Q. And that's referring to the next line  
9 there, that Plaintiff SRL was formed after this event,  
10 correct?

11 A. Yes, but I don't know why it's this  
12 February 16 put there because I -- as I remember, it  
13 was earlier.

14 Q. You remember that RIT, SRL -- strike  
15 that.

16 What specifically was earlier?

17 A. Well, I think it was at the end of 1997  
18 when government requested to re-register the company.

19 Q. The company being RIT, SRL?

20 A. Yes.

21 Q. And at that point in time you recall that  
22 RitLabs, SRL was created?

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1 Q. And you didn't ask to see a copy of the  
2 agreement, correct?

3 A. Correct.

4 Q. And that's because you were busy with  
5 other matters?

6 A. Yes.

7 Q. Did you have any questions at that point  
8 in time or concerns about what this company, RitLabs,  
9 Inc., was?

10 A. Well, at that time I didn't know  
11 exactly -- that it was exactly RitLabs, Incorporated.  
12 I knew that Mr. Demcenko somehow sends money for us  
13 for -- to RitLabs, SRL, but I didn't knew about the  
14 basis he was acting on and what company was used to  
15 send money from -- from -- from what company's account  
16 money are going into RitLabs, SRL.

17 Q. But you could have asked about that and  
18 found out, correct?

19 A. Theoretically, yes.

20 Q. Now, Mr. Tanurkov, isn't it true that you  
21 agreed on behalf of Plaintiff RitLabs, SRL that  
22 Plaintiff would be a shareholder in Defendant RitLabs,

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1 Inc.?

2 A. Well, yes, I basically agreed that the  
3 Plaintiff -- SRL should have a share in RitLabs,  
4 Incorporated.

5 Q. Do you recall what that share was that  
6 you agreed to?

7 A. Well, I -- no, this is not what I was  
8 agree with -- with the way Mr. Demcenko put it in the  
9 shareholder agreement he told me to sign as a  
10 technical director.

11 Q. So did -- sorry, go ahead.

12 A. Because I was acting -- when -- when I  
13 was signing that subscription agreement, I was  
14 thinking that I'm doing this to help Mr. Demcenko to  
15 help with this -- his process of obtaining visa and  
16 not as -- I didn't -- and I didn't see that agreement  
17 as -- as the real one.

18 Q. What do you mean by that? Did you think  
19 it was a fake agreement?

20 A. Well, I think that this agreement should  
21 be discussed between SRL owners before, but  
22 Mr. Demcenko told me that there is no need to talk

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1 about -- about this and just sign it and send it back.

2 Q. So you told Mr. Demcenko that you thought  
3 that you and Mr. Demcenko should talk to Mr. Masiutin  
4 about this shareholder agreement?

5 A. No, this is -- no, this is the way I -- I  
6 was thinking, but what actually happened, Mr. Demcenko  
7 just asked me to sign that agreement.

8 Q. And you were thinking at the time that  
9 you and he should talk to Mr. Masiutin about it,  
10 correct?

11 A. Yes, I -- I was talking -- I was thinking  
12 that this is not right and this is -- this is  
13 something that should be discussed between company  
14 members.

15 Q. Did you contact or tell Mr. Masiutin  
16 about this agreement?

17 A. Not at that time.

18 Q. When did you finally tell him about this  
19 agreement?

20 A. Well, when I received that agreement. It  
21 was -- I actually didn't understand what my signature  
22 is about. I was thinking that it was just merely a